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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 1:18-CR-00057
Plaintiff,	:	INITIAL NOTICE OF
v.	:	COMPLIANCE AND
	:	REQUEST FOR RECIPROCAL
RON ROCKWELL HANSEN,	:	DISCOVERY
Defendant.	:	Judge Dee Benson
	:	Magistrate Judge Paul M. Warner

The United States of America, by and through the undersigned, hereby files its initial notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant(s).

The United States gives notice that the following is being or has been provided to

counsel for the defendant(s):

Description	Document Bates Ranges:
Initial Discovery: One (1) DVD: <ul style="list-style-type: none"> • PDF format • Excel format 	AMEX-001-00001 to AMEX-001-00004; AMEX-002-00001 to AMEX-002-00005; AMEX-003-00001 to AMEX-003-00057; AMEX-CDLC51005-00001 to 00076; AMEX-DJH41009-00001 to 00048; AMEX-DJH42007-00001 to 00086; AMEX-JH1005-00001 to 00531; AMEX-JH2000-00001 to 00755; AMEX-JH73008-00001 to 00021; AMEX-JRH11005-00001 to 00054; AMEX-JRH12003-00001 to 00031; AMEX-JRH41008-00001 to 00098; AMEX-MKH52003-00001 to 00012 AMEX-MKH53001-00001 to 00120; AMEX-NH61004-00001 to 00055; AMEX-RG1004-00001 to 00022; AMEX-RH1003-00001 to 00675; AMEX-RH42001-00001 to 00160; AMEX-UT1002-00001 to 00025; BAF-001-00001 to BAF-001-00002; BAF-BJ5546-00001 to BAF-BJ5546-00056; BAF-RH1730-00001 to BAF-RH1730-00205; BAF-RRH3106-00001 to BAF-RRH3106-00089; BAF-VH3114-00001 to BAFVH3114-00027; CITI-001-00001 to CITI-001-00002; CITI-MH3445-00001 to CITI-MH3445-00083; CITI-MH9546-00001 to CITI-MH9546-00074; CITI-RRH4898-00001 to CITI-RRH4898-00008; CITI-RRH9676-00001 to CITI-RRH9676-00066; CO-001-0001 to CO-001-0004; CO-002-0001 to CO-002-0004; CO-JH2274-00001 to CO-JH2274-00189; CO-JH2274-00190 [Native Excel File]; CO-JH2274-00191 [Native Excel File]; CO-JH2975-00001 to CO-JH2975-00068;

	<p> CO-MH3157-00001 to CO-MH3157-00054; CO-MH3517-00055 [Native Excel File]; CO-MH3517-00056 [Native Excel File]; CO-MH7891-00001 to CO-MH7891-00268; CO-MH7891-00269 [Native Excel File]; CO-MH7891-00270 [Native Excel File]; CO-RH4472-00001 to CO-RH4472-00235; CO-RH5725-00001 to CO-RH5725-00064; CO-RH5725-00065 [Native Excel File]; CO-RH5725-00066 [Native Excel File]; CO-RRH6173-00001 to CO-RRH6173-00282; CO-RRH6173-00283 [Native Excel File]; CO-RRH6173-00284 [Native Excel File]; CO-RRH6173-00286 to CO-RRH6173-00326; CS-001-00001 to CS-001-00254; DELTA-001-0001 to DELTA-001-0011; </p> <p> EFAX-001-00001 to EFAX-001-00066; ET-MH0391-00001 to ET-MH0391-00056; ET-MH8976-00001 to ET-MH8976-00046; EXP-001-00001 to EXP-001-00014; </p> <p> FD-001-00001 to FD-001-00023; FD-002-00001 to FD-002-00152; FD-003-00001 [Two Native Excel Files]; FEDEX-H11-0001 to FEDEX-H11-2605; FEDEX-H11-2606 [Native Excel File] FEDEX-H11-2607 [Native Excel File] FEDEX-H11-2608 [Native Excel File]; FEDEX-H11-2609 [Native Excel File]; FEDEX-H11-2610 [Native Excel File]; </p> <p> IPAY-001-00001 [13 Native Excel Files]: IPAY-8690-00001 to IPAY-8690-00266; IPAY-9130-00001 to IPAY-9130-00570; </p> <p> JPMC-001-00001 to JPMC-001-00013; JPMC-JH2357-00001 to 00250; JPMC-JH3002-00001 to 00239; JPMC-JH7171-00001 to 00095; JPMC-MH3711-00001 to 00227; </p>
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	<p>JPMC-MH5839-00001 to 00093; JPMC-MH7037-00001 to 00132; JPMC-MH9101-00001 to 00077; JPMC-RH4654-00001 to 00241; JPMC-RH5274-00001 to 00341; JPMC-RRH8522-00001 to 00096; JPMC-RRH8506-00001 to 00189;</p> <p>MACU-001-00001 to MACU-001-00002; MACU-CSC4410-00001 to 00217; MACU-MH2388-00001 to 00748; MACU-RRH4160-00001 to 00877;</p> <p>RS-001-0001 to RS-001-0056; SBSU-001-00001 to SBSU-001-00002; SBSU-CSC0987-00001 to SBSU-CSC0987-02275; SUM-001-0001 to SUM-001-0148; SUM-002-0001 to SUM-002-0275; SUM-003-0001 [Native Excel File]; SUM-004-0001 [Native Excel File]; SUM-005-0001 [Native Excel File]; SUM-006-0001 [Native Excel File]; SUM-007-0001 [Native Excel File];</p> <p>TSYS-001-00001 to TSYS-001-00004; TSYS-NUV1960-00001 to TSYS-NUV1960-00026; TSYS-NUV1960-00027 [Excel Native File]; TSYS-NUV9406-00001 to TSYS-NUV9406-00044; TU-001-00001 to TU-001-00024;</p> <p>UDOC-AA-01-00001 to 00005; UDOC-ACFPS-01-00001 to 00003; UDOC-ACFPS-02-00001 to 00007; UDOC-BJ-01-00001 to 00009; UDOC-CCS-01-00001 to 00017; UDOC-FFF-01-00001 to 00005; UDOC-H11-01-00001 to 00010; UDOC-H11-02-00001 to 00008; UDOC-H11-03-00001 to 00002; UDOC-H11-04-00001; UDOC-H11-05-00001 to 00006;</p>
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	<p> UDOC-PRV-01-00001 to 00003; UDOC-UPW-01-00001 to 00003; UDOC-UTS-01-00001 to 00003; UDOC-XL-01-00001 to 00002; USDHS-001-00001 to USDHS-001-00010; USDOC-001-0001 to USDOC-001-0032; USDOS-001-0001 to USDOS-001-0003; USDOT-001-0001 to USDOT-001-0003; USTX-2012-001-0001 to 0051; USTX-2012-002-0001 to 0026; USTX-2012-003-0001 to 0022; USTX-2012-004-0001 to 0021; USTX-2013-001-0001 to 0042; USTX-2013-002-0001 to 0025; USTX-2013-003-0001 to 0020; USTX-2013-004-0001 to 0018; USTX-2013-005-0001 to 0021; USTX-2013-006-0001 to 0027; USTX-2014-001-0001 to 0027; USTX-2014-002-0001 to 0024; USTX-2014-003-0001 to 0020; USTX-2014-004-0001 to 0019; USTX-2014-005-0001 to 0024; USTX-2014-006-0001 to 0044; USTX-2015-001-0001 to 0033; USTX-2015-002-0001; USTX-2015-003-0001 to 0025; USTX-2015-004-0001 to 0021; USTX-2015-005-0001 to 0021; USTX-2016-001-0001 to 0032; USTX-2016-002-0001; USTX-2016-003-0001 to 0024; USTX-2016-004-0001 to 0020; USTX-2016-005-0001 to 0022; USTX-2017-00001 to 0022; USTX-2017-005-0001 to 0024; VON-001-0001 to VON-001-0023; WFB-001-00001 to WFB-001-00051; WFB-002-00001; WFB-003-00001 to WFB-003-00003; </p>
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	WFB-004-00001 to WFB-004-00002; WFB-005-00001; WFB-006-0001 to WFB-006-0056; WFB-007-0001 to WFB-007-0004; WFB-AA1989-00001 to 00089; WFB-ACFPS6364-00001 to 00204; WFB-ACFPS6750-00001 to 00382; WFB-ACFPS7584-00001 to 00067; WFB-EM1551-00001 to 00061; WFB-FFF1963-00001 to 001963; WFB-H110235-00001 to 00512; WFB-H110237-00001 to 00046; WFB-H110345-00001 to 00140; WFB-H111000-00001 to 02576; WFB-H111064-00001 to 00036; WFB-H112073-00001 to 00009; WFB-H113841-00001 to 00161; WFB-H113972-00001 to 00820; WFB-H114210-00001 to 00180; WFB-H115473-00001 to 00230; WFB-H115481-00001 to 00226; WFB-H118100-00001 to 00214; WFB-H118171-00001 to 00198; WFB-H118498-00001 to 00744; WFB-H118506-00001 to 00145; WFB-H119203-00001 to 00030; WFB-H119296-00001 to 00065; WFB-H119315-00001 to 00070; WFB-H119231-00001 to 00038; WFB-KH0001-00001 to 00030; WFB-KH0474-00001 to 00250; WFB-KH4068-00001 to 00048; WFB-KH4410-00001 to 00074; WFB-KH4892-00001 to 00522; WFB-KH9148-00001 to 00067; WFB-NUV0702-00001 to 00370; WFB-NUV0723-00001 to 00115; WFB-NUV4721-00001 to 00719; WFB-NUV5811-00001 to 00023; WFB-PR1356-00001 to 00166; WFB-PR8921-00001 to 00101;
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	WFB-RH0035-00001 to 00422; WFB-RH4798-00001 to 02221; WFB-RH5004-00001 to 00296; WFB-RH5447-00001 to 00348; WFB-RH6371-00001 to 00036; WFB-UT8280-00001 to 00173; WFB-XL1034-00001 to 00064
<u>Supplemental</u> <ul style="list-style-type: none"> • Hard Copy of Document Index for Initial NOC dated: 07-13-2018 	[No Document Control Number] 19 pages

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in

Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 13th day of July, 2018.

JOHN W. HUBER
United States Attorney

/s/ Robert A. Lund
ROBERT A. LUND
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on the 13th day of July, 2018, I caused to be sent, via ECF notification and/or first class mail, postage prepaid, a copy of the foregoing INITIAL NOTICE OF COMPLIANCE AND REQUEST FOR RECIPROCAL DISCOVERY to the following:

Utah Federal Defenders Office
46 West Broadway, Suite 110
Salt Lake City, UT 84101
Attorneys for Defendant Ron Rockwell Hansen

/s/ Glen H. Proctor
Glen H. Proctor
Litigation Support Specialist